

**SUPPLEMENTAL DECLARATION OF JUAN PROAÑO, CHIEF EXECUTIVE
OFFICER OF LEAGUE OF UNITED LATIN AMERICAN CITIZENS**


I, Juan Proaño, pursuant to 28 U.S.C. § 1746, declare that the following statements are true and correct to the best of my knowledge and belief:

1. This declaration supplements my January 21, 2025 declaration in this case.
2. On January 21, 2025, “Carmen,” a LULAC member described in my prior declaration in this case, gave birth.¹
3. “Katrina” is a LULAC member who is currently pregnant. She resides in Rhode Island. Katrina has a pending application for asylum, but she has no other immigration status. The father of her child also has no immigration status.
4. Under the Order, Katrina’s child risks being deemed not a U.S. citizen, despite being born on U.S. soil.
5. Katrina fears that, because of the Order, her child could be targeted by immigration enforcement and deported to Guatemala, separating the child from family in the United States. If sent to Guatemala, Katrina believes her child would be at grave risk due to the ongoing violence and lack of government protection.
6. Katrina intends to apply for a passport for her child when born, but under the Order the child risks being deemed ineligible for a U.S. passport, making it difficult to prove identity or obtain necessary protections.
7. Because of the Order, Katrina’s baby risks being denied access to essential healthcare services.
8. Katrina’s baby would qualify for health insurance under Medicaid when born, but risks being denied critical early life medical care because of the Order.

¹ To protect our members’ privacy and security, I am using fictitious names to describe them.

9. I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of February 2025.

A handwritten signature in black ink, appearing to read "Juan Proaño", is written over a light gray rectangular background.

Juan Proaño